

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

JENNIFER DEUEL,
on behalf of herself and
all others similarly situated,

Plaintiff,

Case No. 22-cv-1504

v.

ILLUMINUS, *et. al.*

Defendants

PLAINTIFF'S MOTION FOR APPROVAL OF SERVICE AWARD

COMES NOW Plaintiff, Jennifer Deuel, on behalf of herself and all others similarly-situated, by and through counsel, WALCHESKE & LUZI, LLC, and hereby respectfully Motions this Court for approval of Plaintiff's Service Award on the grounds set forth below.

1. The Seventh Circuit has recognized that, in appropriate cases, class representatives may be entitled to service awards. *See Spicer v. Chi. Bd. Options Exch.*, 844 F. Supp. 1226, 1267 (N.D. Ill. 1993) (citing *In re Cont'l Ill. Sec. Litig.*, 962 F.2d 566, 571 (7th Cir. 1992)). The amount of the award can reflect the extent to which the class has benefitted from the plaintiff's efforts to protect the interests of the class and the amount of time and effort expended. *See Cook v. Niedert*, 142 F.3d 1004, 1016 (7th Cir. 1998).

2. In this case, the parties have agreed that Plaintiff will receive a Service Award, subject to Court approval, in the total amount of \$5,000.00. (ECF No. 29-1, ¶ 3.3.) Defendants do not oppose this request and agree that it is reasonable, (*id.*), and the approval of Plaintiff's Service Awards by this Court will not affect, in any way, the amounts paid to FLSA Collective and

WWPCL Class members.

3. Plaintiff's Service Award is reflective of Plaintiff's work with counsel in bringing and prosecuting this matter (including but not limited to: providing counsel with pre-suit information and documentation in order to uncover Defendants' violations of the FLSA and WWPCL; working closely with counsel in reviewing and evaluating Defendants' data and information production throughout the duration of this case; and actively participating in the parties' settlement discussions on behalf of the FLSA Collective and WWPCL Class members), the significant monetary success of the parties' settlement, and the extent to which the FLSA Collective and WWPCL Class members have benefitted from Plaintiff's efforts to protect their legal and monetary interests.

4. Plaintiff's Service Award is fair, reasonable, and comparable vis-à-vis other service awards granted to other lead Plaintiffs in multi-Plaintiff cases under the FLSA and WWPCL in this District. *See, e.g., Jacobson v. Milan Laser Corporate, LLC, et. al.*, Case No. 21-cv-1242, ECF No. 55 (E.D. Wis. December 14, 2023) (Griesbach, J.); *Knuth v. Johnsonville, LLC*, Case No. 21-cv-918, ECF No. 23 (E.D. Wis. November 16, 2023) (Adelman, J.); *Harrington v. Nemak USA, Inc.*, Case No. 22-cv-693, ECF No. 66 (E.D. Wis. November 8, 2023) (Adelman, J.); *Christoph v. Schwabe North America*, Case No. 22-cv-975, ECF No. 46 (E.D. Wis. June 28, 2023) (Griesbach, J.); *Wallace v. Tri-City Glass & Door, Inc.*, Case No. 21-cv-490, ECF No. 58 (E.D. Wis. November 21, 2022) (Griesbach, J.); *Magalhaes, et. al. v. ProAmpac Intermediate, Inc., et. al.*, Case No. 20-cv-1333, ECF No. 53 (E.D. Wis. November 18, 2022) (Griesbach, J.); *Sorenson v. The Rennes Group, Inc., et. al.*, Case No. 21-cv-920, ECF No. 45 (E.D. Wis. September 20, 2022) (Griesbach, J.); *Todd v. AA Healthcare Management LLC, et. al.*, Case No. 20-cv-1744, ECF No. 58 (E.D. Wis. August 5, 2022) (Ludwig, J.); *Myles, et. al. v. Wellpath LLC*, Case No. 20-cv-1498, ECF No.

48 (E.D. Wis. July 11, 2022) (Dries, J.); *Thames v. Steele Solutions, Inc.*, Case No. 21-cv-664, ECF No. 41 (E.D. Wis. July 11, 2022) (Dries, J.); *Sato v. Puratos Corporation*, Case No. 12-cv-173, ECF No. 34 (E.D. Wis. March 25, 2022) (Stadtmueller, J.); *Harrison v. Sunny Ridge Nursing and Rehabilitation Center, LLC*, 20-cv-197, ECF No. 51 (E.D. Wis. March 16, 2022) (Pepper, J.); *Gillison v. Hunter Douglas Fabrication Company*, Case No. 21-cv-389, ECF No. 30 (E.D. Wis. March 3, 2022) (Griesbach, J.); *Wilkerson v. Laser, LLC*, Case No. 20-cv-1739, ECF No. 43 (E.D. Wis. January 28, 2022) (Griesbach, J.); *Wright v. Denali Staffing, LLC*, 20-cv-1185, ECF No. 39 (E.D. Wis., December 10, 2021) (Adelman, J.); *Trautman v. Midwest Composite Technologies, LLC*, Case No. 21-cv-43, ECF No. 140 (E.D. Wis. November 15, 2021) (Dries, J.); *Imes v. Amalga Composites, Inc.*, 19-cv-1130, ECF No. 40 (E.D. Wis., September 21, 2021) (Adelman, J.); *Mitchell v. Trilliant Food and Nutrition, LLC*, Case No. 19-cv-147, ECF No. 185 (E.D. Wis. September 2, 2021) (Griesbach, J.); *Cooper v. OS Restaurant Services, LLC, et. al.*, Case No. 20-cv-240, ECF No. 57 (E.D. Wis. June 9, 2021) (Adelman, J.); *Aguilar v. Bel Brands USA, Inc.*, Case No. 20-cv-759, ECF No. 35 (E.D. Wis. April 29, 2021) (Griesbach, J.); *Stirmel v. S&C Electric Company*, 20-cv-347, ECF No. 44 (E.D. Wis. March 5, 2021) (Adelman, L.); *Yegger v. TRN Milwaukee*, Case No. 20-cv-144, ECF No. 21 (E.D. Wis. June 23, 2020) (Adelman, L.); *Winter v. U.S. Paper Mills Corp., et. al.*, Case No. 19-cv-657, ECF No. 41 (E.D. Wis. May 7, 2020) (Griesbach, J.); *Melzer v. Pro Label, Inc.*, Case No. 18-cv-1080, ECF No. 37 (E.D. Wis. January 23, 2020) (Griesbach, J.); *Lee v. UL LLC*, Case No. 17-cv-1617, ECF No. 19 (E.D. Wis. November 25, 2019) (Griesbach, J.); *Johnson v. National Technologies, Inc.*, No. 18-cv-462, ECF No. 57 (E.D. Wis., July 22, 2019) (Jones, J.); *Dietzen v. Community Loans of America, Inc.*, Case No. 18-cv-818, ECF No. 39 (E.D. Wis. May 15, 2019) (Griesbach, J.); *Weninger v. General Mills Operations, LLC*, Case No. 18-cv-321, ECF No. 93 (E.D. Wis. April 18, 2019) (Stadtmueller, J.);

Gerlach v. West Revenue Generation Services, et. al., Case No. 18-cv-170, ECF No. 91 (E.D. Wis. January 3, 2019) (Griesbach, J.).

WHEREFORE, Plaintiff respectfully requests that this Court grant his Motion for Approval of Service Award in the amount of \$5,000.00 as set forth herein.

Dated this 4th day of January, 2024

WALCHESKE & LUZI, LLC
Counsel for Plaintiff

s/ Scott S. Luzi
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